

Pacific Telecom Inc. P.O. Box 500306 Saipan, MP 96950

Annual 47 C.F.R. §64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64-2009(e) CPNI Certification for 2007

Date filed:

February 27, 2008

Name of Companies Covered by this certification: The Micronesian Telecommunications

Corporation (MTC) and its wholly-owned subsidiary PTI Pacifica Inc. (formerly known as GTE Pacifica Inc.)

Form 499 Filer ID:

PTI Pacifica Inc. 803890; MTC 803851

Name of signatory:

Larry Knecht

Title of signatory:

Executive Vice President of MTC and PTI Pacifica Inc.

I, Larry Knecht, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that each company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at the companies.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

Larry Knecht EVP/CFO

CPNI Compliance Accompanying Statement

This accompanying statement explains how the operating procedures of Micronesia Telecommunications Corporation ("MTC") and PTI Pacifica Inc. (formerly known as GTE Pacifica Inc.) (collectively "PTI") ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations. MTC provides local exchange service; PTI Pacifica Inc. provides CMRS and interexchange service.

PTI adheres to all CPNI rules as stated in section 64.2001- 64.2011 concerning the proper use of our customers' CPNI. PTI does not presently use, disclose, or permit access to CPNI in a manner that requires opt-in approval. It is PTI's current policy to not use CPNI for any marketing purposes, either within or outside a customer's total services. To the extent that CPNI is used in the future to market outside a customer's total services, it is PTI's current intention to limit such use for the purpose of marketing communications-related services. Specifically, our opt-out notice and approval for use of CPNI approval process meets all requirements as listed in Sections 64.2007-64.2008.

To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of PTI's 's policies and procedures to ensure compliance with the federal CPNI rules; and
- The establishment of procedures for notification to the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

PTI has taken reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including network security measures consistent with industry best practices. PTI also protects certain customer information, including information which constitutes CPNI, in accordance with a Network Security Agreement entered into with U.S. executive branch agencies. See 18 FCC Rcd. 23140 (IB 2003). With respect to the FCC's rules, PTI requires

proper authentication prior to disclosing CPNI based on customer initiated telephone contact, online account access or in-store visits.

- With respect to customer-initiated telephone calls, PTI will only provide call detail information when a password is provided, or by sending it to the customer's address of record or by calling the telephone number of record.
- All online access requires a password, although PTI is subject to a June 8, 2008 compliance deadline with respect to this requirement.
- In-store access to CPNI requires either a password or valid photo ID.
- Notification of account changes, including password, backup authentication method, online account or address of record, is provided to customers in accordance with FCC rules.

PTI has implemented processes to notify law enforcement and affected customers of a breach of customers' CPNI consistent with the FCC's rules. Records of breaches (if any) are maintained for at least two years.